

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Action No. <u>3:13-cv-00205-SLC</u>
)	
v.)	
)	
JOHN DOE subscriber assigned IP)	
address 24.183.51.58,)	
)	
Defendant.)	
)	

**PLAINTIFF’S SECOND MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO SHOW CAUSE ORDER**

Plaintiff, Malibu Media, LLC (“Plaintiff”), moves for entry of an order extending the time within which Plaintiff has to file a response to the Court’s Show Cause Order [CM/ECF 7], and states:

1. On May 28, 2013, this Court entered an order sealing the Complaint in this case, staying all matters, and requiring Plaintiff to show cause why attaching Exhibit C to the Complaint does not violate Rule 11(b) [CM/ECF 7].
2. Pursuant to the Court’s Order dated June 7, 2013, Plaintiff’s deadline to respond to the Show Cause Order is June 21, 2013 [CM/ECF 10].
3. Plaintiff is taking its obligation to respond to the Show Cause Order very seriously. Accordingly, Plaintiff’s counsel has been diligently working on Plaintiff’s response to the Show Cause Order and has a working draft of same.
4. When attempting to finalize the response and fill in missing citations this morning, Plaintiff’s counsel found a Seventh Circuit case that requires that the current draft of the response be substantially edited.

5. Significantly, Plaintiff's counsel had spent more than thirty five hours on research prior to today and until this morning believed it had found all the applicable law.

6. Unfortunately, the response will not be in a sufficient form to file with the Court by close of business.

7. Plaintiff requires a brief extension of three (3) business days within which to complete and file its response to the Court's show cause order.

8. No party will be prejudiced by the granting of the extension, as the case has been stayed pending the resolution of this matter. Given the gravity of this matter, Plaintiff should be allowed adequate time to formulate its response.

9. Good cause exists to grant this motion.

10. This motion is not being interposed for the purpose of delay, but rather so that substantive justice can be done.

WHEREFORE, Plaintiff respectfully requests that the time within which it must file its response to the Court's Show Cause Order be extended an additional three (3) business days, or until June 26, 2013. A proposed order is attached for the Court's convenience.

Dated: June 21, 2013

Respectfully submitted,
SCHULZ LAW, P.C.

By: /s/ Mary K. Schulz
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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Mary K. Schulz